IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

IN RE:	)	
	)	
JOANNE COLLINS	)	**NO: 3:16-bk-33456-SHB**
	)	**Chapter 7**
	)	
Debtor	)	

NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING

Pursuant to Local Rule 9013-1(h), the court may consider this matter without further notice or hearing unless a party in interest files an objection. If you object to the relief requested in this paper, you must file with the clerk of the court at Howard H. Baker, Jr., U.S. Courthouse, 800 Market Street, Suite 330, Knoxville, TN 37902, an objection within **21 days** from the date this paper was filed and serve a copy on the movants' attorney, Law Offices of Mayer and Newton, Landmark Center, South Tower, Suite S-570, 1111 Northshore Drive, Knoxville, TN 37919. If you file and serve an objection within the time permitted, the court will schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the court will consider that you do not oppose the granting of the relief requested in this paper and may grant the relief requested without further notice or hearing.

DEBTOR'S MOTION TO REDEEM PERSONAL PROPERTY

Comes now the Debtor, through counsel, and would respectfully represent as follows:

1. The property described in the Debtor's Schedule D, a 2011 Nissan Sentra [VIN# 3N1AB6AP8BL683104], constitutes tangible personal property intended primarily for the personal, family and household use of the Debtor.

2. The lien of Credit Acceptance Corp. on such personal property secured a dischargeable debt that was incurred by the Debtor for personal, family or household use.

3. The Debtor desires to redeem the property from the lien of Credit Acceptance Corp.

4. The Debtor believes the current fair market value for the vehicle to be approximately $3,800.00. An Affidavit by the Debtor stating this value is attached hereto as **Exhibit A** and incorporated by reference.

5. The personal property herein described has been abandoned by the Chapter 7 Trustee.

WHEREFORE, pursuant to 11 U.S.C. 722 and Local Rule 6008-1, the Debtor prays that she be permitted to redeem the property by paying to Credit Acceptance Corp. the amount of $3,800.00.

JOANNE COLLINS,

DATED: 02/01/17

BY: **/s/Richard M. Mayer, #5534**
/s/John P. Newton, #010817
LAW OFFICES OF MAYER & NEWTON
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1111 Northshore Drive S-570
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(865) 588-5111
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing Motion to Redeem Personal Property and Proposed Order has been forwarded by first class U.S. Mail (USP), postage prepaid, or by Electronic Case Filing (ECF) to the following:

F. Scott Milligan, Chapter 7 Trustee (ECF)
Tiffany Diiorio, Office of the United States Trustee (Email)

Credit Acceptance Corp.
Compliance/Corporate Legal
25505 W 12 Mile Road
Southfield, MI 48034-1846
Registered Agent

Credit Acceptance Corp.
PO Box 5070
Southfield, MI 48086

/s/Richard M. Mayer, #5534
/s/John P. Newton, #010817
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DATED: 02/01/17